

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**  
*Pittsburgh Division*

IN RE:  
RONALD S. JONES

Freedom Mortgage Corporation,  
Movant

vs.

RONALD S. JONES,  
Debtor

Case No. 17-22147-GLT  
Chapter 11

Hearing Date: 8/25/2022

Hearing Time: 11:00 AM

Objection Date: 8/8/2022

**OBJECTION TO CONFIRMATION  
OF DEBTOR'S CHAPTER 13 PLAN**

Freedom Mortgage Corporation ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor(s)' Chapter 11 Plan* (Doc 224), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 11 of the Bankruptcy Code on May 22, 2017.

2. Movant holds a security interest in the Debtor's real property located at 3307 Waterford Dr, Pittsburgh, PA 15238 (the "Property"), by virtue of a Mortgage which is recorded as instrument Number 2016-35264 in Official Records of Allegheny County, Pennsylvania. Said Mortgage secures a Note in the amount of \$275,793.00.

3. The Debtor filed a Chapter 11 Plan (the "Plan") on June 30, 2022 (Doc 224).

4. Movant filed a Proof of Claim in this case on May 16, 2022 (Claim No. 16) which lists a secured claim of \$250,201.48 and pre petition arrears of \$3,993.32.

5. Movant filed an Amended Proof of claim in this case on June 28, 2022 (Claim No. 16-1) which lists a secured claim of \$250,201.48 and prepetition arrears of \$6,097.63.

6. Debtor's Plan includes language that Debtor disputes the existence of any arrearages and also that confirmation constitutes an adjudication that the mortgage is current.

7. Accordingly, Movant objects to Debtor's proposed Chapter 11 Plan.

8. Movant objects to any plan which proposes to pay it anything less than \$6,097.63 as the pre-petition arrearage over the life of the plan.

**WHEREFORE**, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

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**CERTIFICATE OF SERVICE OF OBJECTION TO CONFIRMATION OF DEBTOR'S  
CHAPTER 13 PLAN**

I certify under penalty of perjury that on this day, I served or caused to be served the OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN on the parties at the addresses shown below or on the attached list.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was:

Via CM/ECF electronic notice:

Donald R. Calaiaro, Esq.  
*Counsel for Debtor*

*Chapter 11 Trustee*

*Bankruptcy Administrator*

Via First Class Mail:

RONALD S. JONES  
3307 WATERFORD DRIVE  
PITTSBURGH, PA 15238  
*Debtor*

*Chapter 11 Trustee*

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, names and addresses of parties served by electronic notice will be listed under the heading "Via CM/ECF electronic notice" and those served by mail will be listed under the heading "Via First Class Mail".

EXECUTED ON: July 29, 2022

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

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**PAWB Local Form 7 (07/13)**

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2022, upon consideration of Freedom Mortgage Corporation's Objection to Confirmation of Debtor(s)' Chapter 11 Plan and any response thereto (if any), it is:

**ORDERED AND DECREED:** that Objection to Confirmation of Debtor(s)' Chapter 11 Plan is denied.

\_\_\_\_\_  
Honorable Gregory L. Taddonio  
United States Bankruptcy Court Judge